

Exhibit 4 to the Complaint.

**U.S. Patent No. 10,783,596 v. Delivery.Com**  
**Claim 1 is exemplary.**

Exhibit 4 to the Complaint.

## 1. Claim Chart

Claim	Analysis
<p>[1.P] method, comprising: accessing customer profile via a mobile device;</p>	<p>A Delivery.Com (“Company”) performs and/or induces others to perform a method comprising accessing a customer profile via a mobile device.</p> <p>a This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>a For example, Company provides a Delivery application that is installed on a user’s (“customer”) mobile device. The application allows users to create an account (“accessing a customer profile via a mobile device”) and order food items from different restaurants. Further, the application allows the users to place a group order where the payment for the order is split between the group members.</p>

Exhibit 4 to the Complaint.


The image shows a screenshot of the delivery.com sign-up page. A red rectangular box highlights the sign-up form, which includes the delivery.com logo, the text "Sign up to continue", a link "Already have an account? Log in here", and input fields for "First name", "Last name", "Email Address", and "Password". Below these fields is a reCAPTCHA "I'm not a robot" checkbox and a "Sign Up" button. A red arrow points from the text "accessing a customer profile via a mobile device" to the "First name" input field. The background of the screenshot shows a blurred view of a mobile device screen with the word "Sushi" visible.

accessing a customer profile via a mobile device

Source: <https://www.delivery.com/> (annotated)

Exhibit 4 to the Complaint.

Open the Mac App Store to buy and download apps.



**delivery.com Food & Liquor App** 17+

Order Alcohol Laundry Grocery  
[Delivery.com, LLC](#)  
Designed for iPad  
★★★★★ 4.8 • 33.4K Ratings  
Free

---

**Screenshots** [iPad](#) [iPhone](#)

Source: <https://apps.apple.com/us/app/delivery-com-food-liquor-app/id435168129>

**PICKUP OR DELIVERY**  
Order for pickup and skip the line, or get delivery and have it brought to your door.

**SCHEDULE & REORDER**  
Create scheduled orders for future meals, or use our reorder carousel to bring back trustworthy favorites.

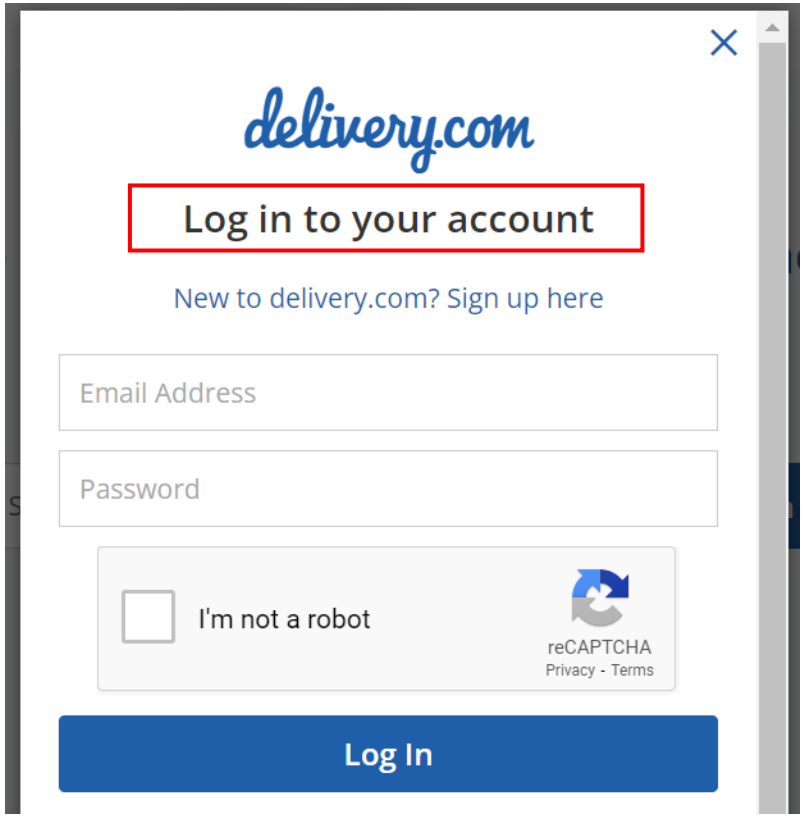
**GROUP ORDERING**  
Use our Group Ordering feature to order with friends, coworkers, neighbors and roommates.

Source: <https://apps.apple.com/us/app/delivery-com-food-liquor-app/id435168129>

Exhibit 4 to the Complaint.

	<ul style="list-style-type: none"> <li>• Select the option to 'Start group order'</li> <li>• Opt-in to Split Pay</li> <li>• Invite others to join your Group Order</li> <li>• Once everyone has ordered, the order will be submitted and participants will be charged accordingly</li> </ul> <p>Source: <a href="https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/">https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/</a></p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
[1.1] responsive to accessing the customer profile, forwarding at least one item selection via the mobile device;	<p>Company performs and/or induces others to perform a step of forwarding at least one item selection via the mobile device responsive to accessing the customer profile.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after logging in to the application ("responsive to accessing the customer profile"), the application displays food menus of multiple restaurants such that the user selects a restaurant and places an order for a food item ("forwarding at least one item selection") via the application ("via the mobile device").</p>

Exhibit 4 to the Complaint.



delivery.com

**Log in to your account**

New to delivery.com? Sign up here

Email Address

Password

☐ I'm not a robot

reCAPTCHA  
Privacy - Terms

**Log In**

Source: <https://www.delivery.com/>

Exhibit 4 to the Complaint.

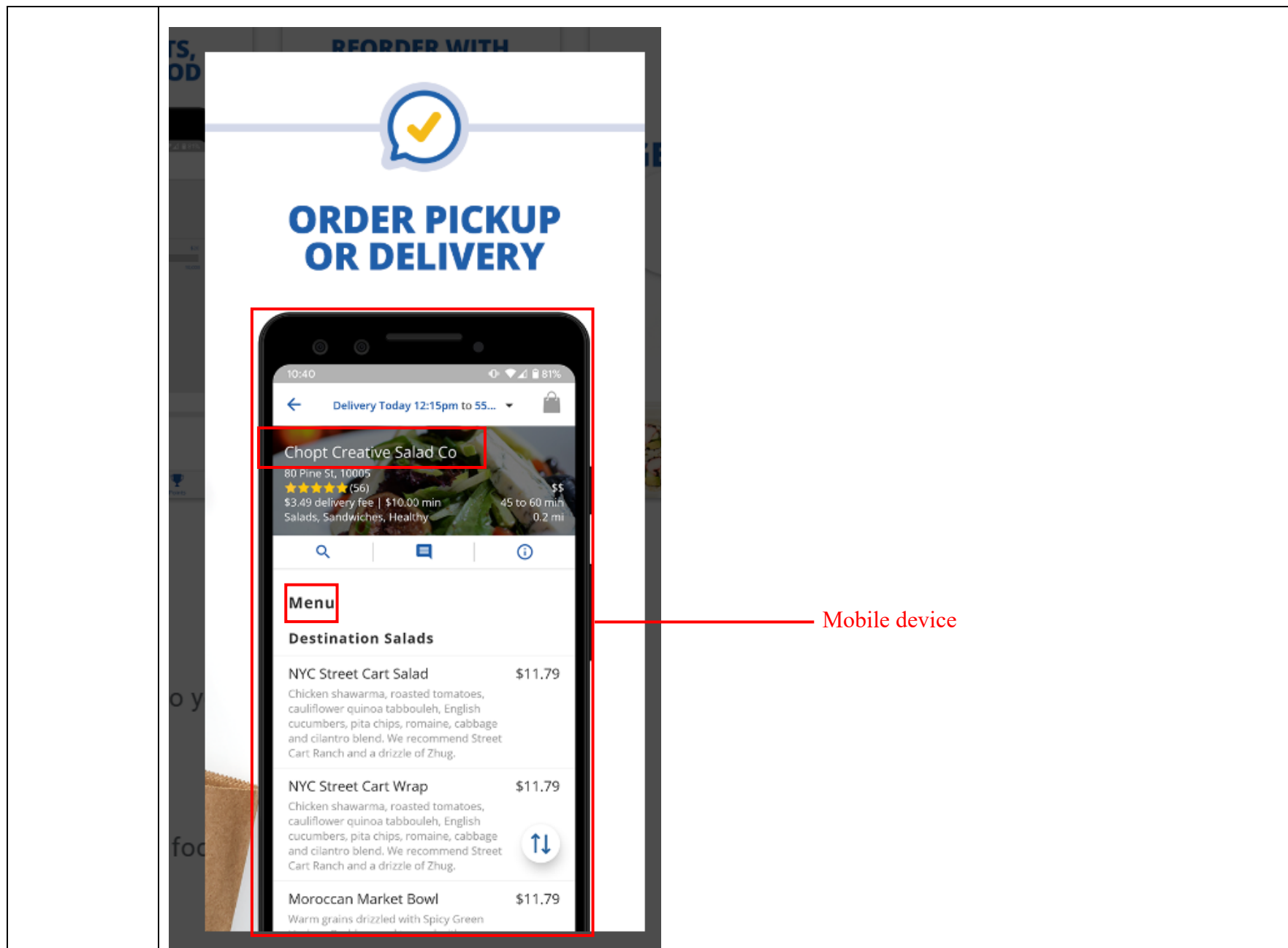
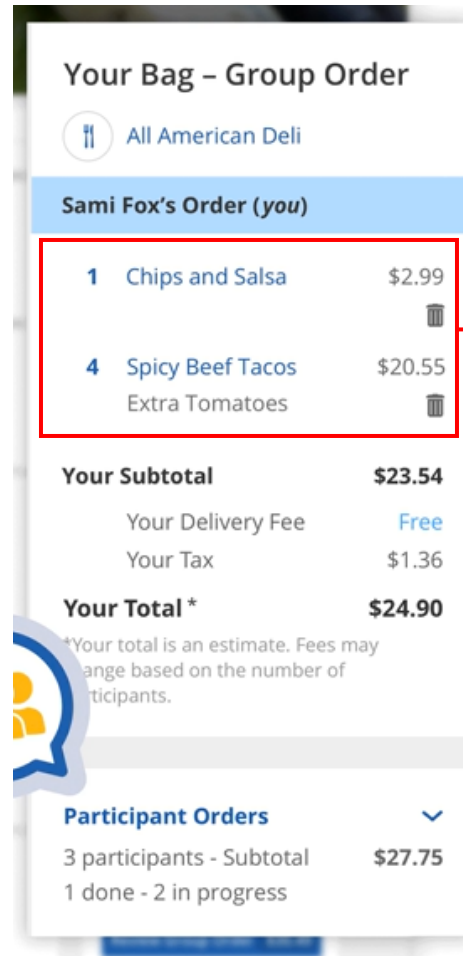


Exhibit 4 to the Complaint.

Source: <https://play.google.com/store/apps/details?id=com.deliverycom> (annotated)



forwarding at least one item selection

Source: <https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/> (annotated)



Exhibit 4 to the Complaint.

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.
[1.2] receiving at least one data element list comprising the at least one item selection at the mobile device;	<p>Company performs and/or induces others to perform a step of receiving at least one data element list comprising the at least one item selection at the mobile device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the application allows the user to create a group and place a group order by inviting other members to the group. Further, when the user as well as the group members select the food items and place the group order, the user or the group organizer opts for bill splitting and proceeds to checkout. During checkout, an order summary is displayed in the application along with the prices, for each member ("receiving at least one data element list comprising the at least one item selection at the mobile device.") to pay for the order.</p> <ul style="list-style-type: none"> <li>• Select the option to 'Start group order'</li> <li>• Opt-in to Split Pay</li> <li>• Invite others to join your Group Order</li> <li>• Once everyone has ordered, the order will be submitted and participants will be charged accordingly</li> </ul> <p>Source: <a href="https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/">https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/</a></p>

Exhibit 4 to the Complaint.


	<div><h2>2. Who's Paying? <span>NEW</span></h2><div><div><input checked="" type="radio"/> Split the bill, simply As organizer, you're only responsible for your share. Don't forget to submit the order after everyone has added their payment.</div><div><input type="radio"/> Organizer covers the cost You'll cover the costs, and also earn the Delivery Points. You can also set spend limits, and access checkout once everyone has ordered.</div></div><p>Source: <a href="https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/">https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/</a></p></div>	
--	---	--

Exhibit 4 to the Complaint.

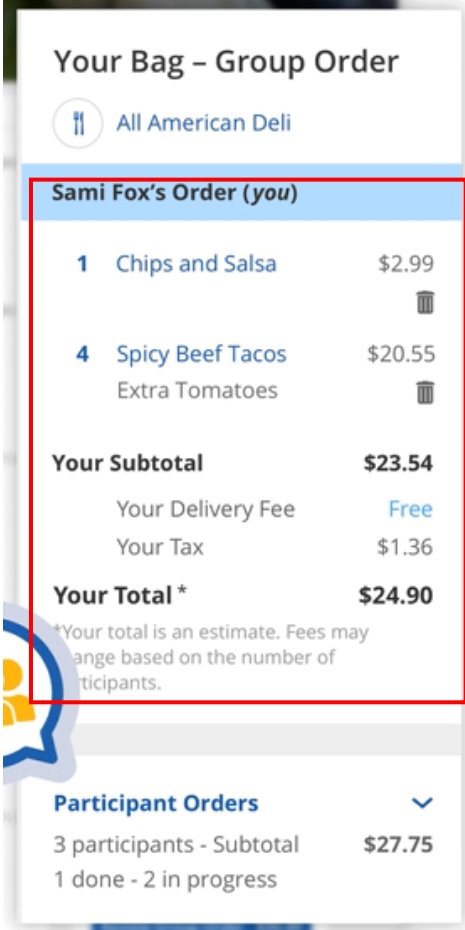
	 <p>at least one data element list comprising the at least one item selection at the mobile device</p> <p>Source: <a href="https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/">https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/</a> (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
[1.3] submitting	Company performs and/or induces others to perform a step of submitting payment data for the at least one item via the mobile device.

Exhibit 4 to the Complaint.

payment data for the at least one item via the mobile device;	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after the order summary is displayed for each member, all of the members make payment for their orders through multiple payment methods such as credit card, Paypal, Apple Pay, Google Pay, and Masterpass (“submitting payment data for the at least one item via the mobile device”).</p> <div><p>WAYS TO PAY</p><p>Pay with all major credit cards, Apple Pay, Google Pay, Visa Checkout, Masterpass, and PayPal. After your first order, cash payment is accepted.</p></div> <p>Source: <a href="https://apps.apple.com/us/app/delivery-com-food-liquor-app/id435168129">https://apps.apple.com/us/app/delivery-com-food-liquor-app/id435168129</a></p>
---	---

Exhibit 4 to the Complaint.

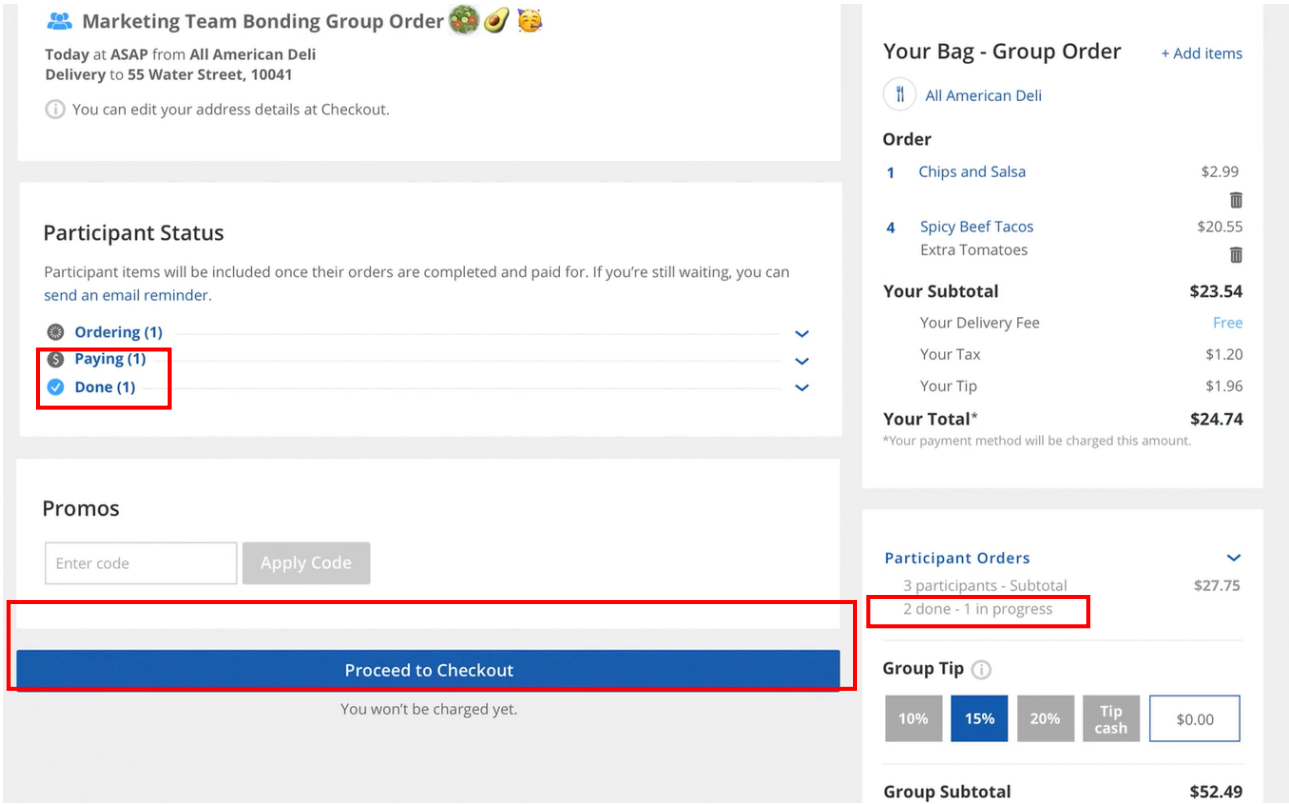
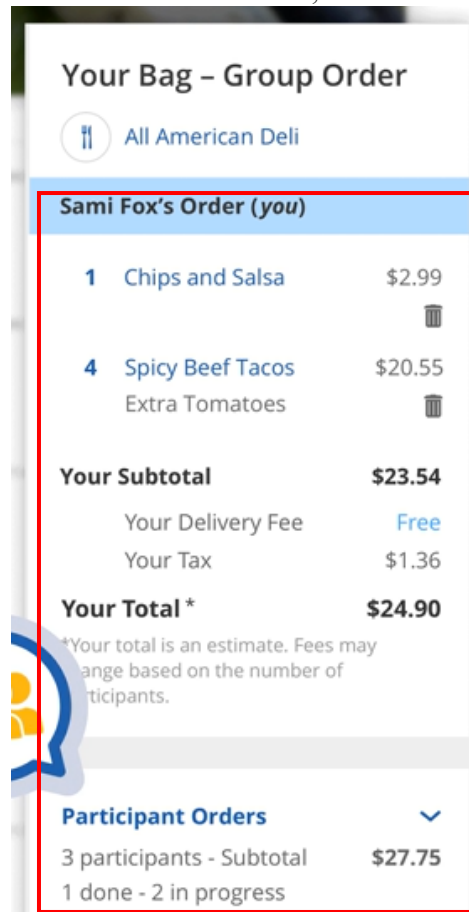
	 <p>Source: <a href="https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/">https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/</a></p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[1.4] wherein the payment is split, via the mobile device, in at least one of a</p>	<p>Company performs and/or induces others to perform a step, wherein the payment is split, via the mobile device, in at least one of a following manner: evenly between at least two separate data element lists; and by separate items, among the at least one item selection, between the at least two separate data element lists.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

Exhibit 4 to the Complaint.

following manner:  
evenly between at least two separate data element lists; and by separate items, among the at least one item selection, between the at least two separate data element lists.

For example, the order summary generated in the application comprises details of the food items distributed among different members of the group based on the orders placed by the individual members ("by separate items, among the at least one item selection, between the at least two separate data element lists").



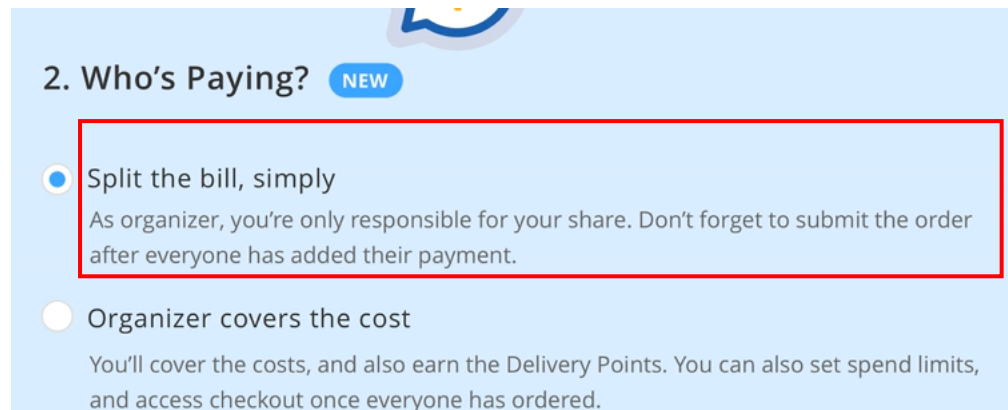
between the at least two  
separate data element lists

Source: <https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/> (annotated)

Exhibit 4 to the Complaint.

- Select the option to 'Start group order'
- Opt-in to Split Pay
- Invite others to join your Group Order
- Once everyone has ordered, the order will be submitted and participants will be charged accordingly

Source: <https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/>



Source: <https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

Exhibit 4 to the Complaint.

## 2. List of References

1. <https://www.delivery.com/>, last accessed on 25 April 2024.
2. <https://play.google.com/store/apps/details?id=com.deliverycom>, last accessed on 25 April 2024.
3. <https://apps.apple.com/us/app/delivery-com-food-liquor-app/id435168129>, last accessed on 25 April 2024.
4. <https://blog.delivery.com/2023/04/11/introducing-split-pay-for-group-orders-3/>, last accessed on 25 April 2024.